

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Susan R. Casagrande	:	Chapter 13
	:	
Debtor(s)	:	Case No.: 22-11245-ELF

OBJECTION TO PROOF OF CLAIM #3-1
OF CAVALRY SPV I, LLC

Debtor, Susan R. Casagrande, by and through her undersigned counsel attorney Brad J. Sadek, hereby objects to the Proof of Claim No. 3-1 filed on behalf of Cavalry SPV I, LLC and in support thereof avers the following:

1. Debtor filed a Chapter 13 Bankruptcy Petition on May 16, 2022.
2. Creditor, Cavalry SPV I, LLC, filed an unsecured Proof of Claim (#2-1) on July 28, 2022 in the amount of \$19,147.54. See **Exhibit "A."**
3. Under 42 Pa. Consol. Stat. §5525(a), this debt is outside the four year statute of limitations for collectability.
4. The last payment date on the subject debt was March 5, 2009 and the subject debt was sold to the Claimant on or about September 28, 2011 per the subject Claim.
5. Claim 3-1 fails to demonstrate any proof of payments made by the Debtor that shall deem the debt as collectable within the statutory definition of 42 Pa. Consol. Stat. §5525(a).
6. Since the debt is not legally enforceable against the Debtor, the Proof of Claim of Cavalry SPV I, LLC shall be stricken and not receive any distribution from the Chapter 7 trustee in furtherance of the administration of the instant Bankruptcy Estate.

WHEREFORE, Debtor, Susan Casagrande, by and through her undersigned counsel, respectfully requests this Honorable Court to enter an Order disallowing Proof of Claim #3-1 of Cavalry SPV I, LLC in its entirety.

Dated: October 4, 2022

/s/ Brad J. Sadek, Esq.
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